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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

**STATE OF CALIFORNIA, ex rel. ROB
BONTA, in his official capacity as Attorney
General of the State of California,**

Plaintiff,

v.

**PHILLIP DEL ROSA, in his personal
capacity and official capacity as Chairman
of the Alturas Indian Rancheria; and
DARREN ROSE, in his personal capacity
and official capacities as Vice-chairman of
the Alturas Indian Rancheria and
President/Secretary of Azuma Corporation,**

Defendants.

2:23-cv-00743-KJM-SCR

**STIPULATED ELECTRONICALLY
STORED INFORMATION ORDER**

Date: N/A
Time: N/A
Courtroom: 3, 15th Floor
Judge: Hon. Kimberly J. Mueller
Trial Date: N/A
Action Filed: April 19, 2023

1 The parties, Plaintiff State of California ex rel. Rob Bonta, in his official capacity as
2 Attorney General of the State of California (“Plaintiff”), and Defendants Philip Del Rosa, in his
3 personal capacity and official capacity as Chairman of the Alturas Indian Rancheria, and Darren
4 Rose, in his personal capacity and official capacities as Vice-chairman of the Alturas Indian
5 Rancheria and President/Secretary of Azuma Corporation (“Defendants”), by and through their
6 respective attorneys of record, hereby stipulate for the purposes of jointly requesting that the
7 Court enter an order on the production of electronically stored information in this matter as
8 follows:

- 9 1. Each document produced will be in PDF format. However, various types of files,
10 including but not limited to MS Excel spreadsheets, media files, etc., lose significant
11 information and meaning when produced as an image. Such files may be produced in
12 their native format and shall be produced in their native format upon request and
13 subsequent meet and confer. PDFs should be machine-readable unless the original
14 PDF is itself unreadable, such as a scan of a hard-copy document. The parties will not
15 be obligated to OCR PDFs for the opposing party.
- 16 2. Each produced document shall have a unique Bates number, which shall be stamped
17 on every page of each document. The filename of each produced document shall be
18 the Bates number of the first page of the document (“Smith_0035”). For documents
19 returned in native format (either upon request of the opposing party per point #1, or
20 because the document cannot be converted to PDF, such as in the case of an audio
21 recording), the file will be named as a single Bates number (“Smith_0035”), and that
22 filename will serve as the Bates number for the entire file.
- 23 3. The produced documents shall be accompanied by a comprehensive index that
24 includes the Bates number (i.e., the filename) and the metadata set out in Appendix A.
25 The index shall be in .csv format, i.e., readable as a spreadsheet, and ingestible as a
26 load file.
- 27 4. Emails and their attachments shall be produced in an ordered relationship, i.e., in a
28 way that shows which attachments go with which email, and vice-versa. The Bates

1 numbers should reflect this ordered relationship, i.e., the email should be Bates
2 numbered first, then each attachment should be Bates numbered immediately after the
3 parent email. The index should differentiate between an email and an attachment.

- 4 5. The parties will serve a privilege log that includes the document's metadata (per the
5 specification of point #3), and a claim of privilege. Generally, "AC Privilege," "Work
6 Product," or similar shorthand designations, as long as they are understandable, will
7 suffice. The parties will not be obligated to provide additional descriptions of
8 documents unless the opposing party reasonably requests additional information where
9 the metadata is too opaque to provide an adequate description of the document.

10 Dated: November 14, 2025

Respectfully and jointly submitted,

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13 ROB BONTA
14 Attorney General of California
15 JAMES V. HART
16 Supervising Deputy Attorney General
17 DAVID C. GOODWIN
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18 /s/Peter F. Nascenzi
19 PETER F. NASCENZI
20 Deputy Attorney General
21 Attorneys for Plaintiff State of California

/s/Tim Hennessy (as authorized 11/14/25)
TIM HENNESSY
Attorneys for Defendants

22 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

23
24 Dated: November 21, 2025

25
26 

27 SEAN C. RIORDAN
28 UNITED STATES MAGISTRATE JUDGE

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APPENDIX A: REQUESTED METADATA FIELDS FOR ESI

Field Name	Example / Format	Description
Document Number	ABC0000001 (Unique ID)	The Document ID number associated with the first page of a document.
Record Type	Email, attachment, other document type, etc.	Type of document.
Original Email Subject/File Name		The email subject line or the extracted document title or subject of a document.
Original Date/Time	MM/DD/YYYY, HH:MM:SS	The date/time associated with the document's last date/time modified, or when sent/received.
From	Joe Smith <jsmith@email.com>	The display name and e-mail of the author of an e-mail. If only e-mail is given, then just list the e-mail address.
To	Joe Smith <jsmith@email.com>; tjones@email.com	The display name and e-mail of the recipient(s) of an e-mail. If only e-mail is given, then just list the e-mail address.
CC	Joe Smith <jsmith@email.com>; tjones@email.com	The display name and e-mail of the copyee(s) of an e-mail. If only e-mail is given, then just list the e-mail address.
BCC	Joe Smith <jsmith@email.com>; tjones@email.com	The display name and e-mail of the blind copyee(s) of an e-mail. If only e-mail is given, then just list the e-mail address.
Native	Y/N	Whether produced in native format.
Original Folder Name	i.e. Joe Smith/E-mail/Inbox Joe Smith/E-mail/Deleted Items Joe Smith/Loose Files/Accounting/... Joe Smith/Loose Files/Documents and Settings/...	Location of the original document. The source should be the start of the full path.